

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Sheryl L. Haley-Samuels,

Debtor.

Case No. 22-11298-mdc

Chapter 13

Debtor's Motion to Modify Chapter 13 Plan

AND NOW, Debtor Sheryl L. Haley-Samuels, by and through her attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on May 19, 2022.
2. The plan was confirmed on October 19, 2022.
3. The Debtor hereby requests that the Third Amended Chapter 13 Plan filed as ECF No. 31 be approved by the court and adopted as the confirmed chapter 13 plan.
4. The proposed plan cures a payment deficiency that gave rise to the trustee's recent motion to dismiss.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in her favor as may be necessary and proper under the law.

Date: December 6, 2023

CIBIK LAW, P.C.
Counsel for Debtor

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